

1 JAIKUMAR RAMASWAMY

2 Chief, Asset Forfeiture and

3 Money Laundering Section (AFMLS)

4 DANIEL H. CLAMAN, Assistant Deputy Chief

5 WOO S. LEE, Trial Attorney

6 STEPHEN GIBBONS, Trial Attorney

7 Criminal Division

8 United States Department of Justice

9 1400 New York Avenue, N.W., 10th Floor

10 Washington, D.C. 20530

11 Telephone: (202) 514-1263, Woo.Lee@usdoj.gov

12 ANDRÉ BIROTTE, JR.

13 United States Attorney

14 STEVEN R. WELK (Cal. Bar No. 149883)

15 Assistant United States Attorney

16 Chief, Asset Forfeiture Section

17 312 North Spring Street, 14<sup>th</sup> Floor

18 Los Angeles, California 90012

19 Telephone: (213) 894-6166, Steven.Welk@usdoj.gov

20 Attorneys for Plaintiff

21 UNITED STATES OF AMERICA

22 UNITED STATES DISTRICT COURT  
23 FOR THE CENTRAL DISTRICT OF CALIFORNIA

24 UNITED STATES OF AMERICA,

25 Plaintiff,

26 v.

27 ONE MICHAEL JACKSON SIGNED

28 THRILLER JACKET AND OTHER

MICHAEL JACKSON MEMORABILIA;

REAL PROPERTY LOCATED ON

SWEETWATER MESA ROAD IN MALIBU,

CALIFORNIA; ONE 2011 FERRARI 599

GTO,

Defendants.

) No. CV 13-9169-GW-SS

)

) Hon. George H. Wu

)

) DECLARATION OF WOO S. LEE IN

) SUPPORT OF UNITED STATES'

) OPPOSITION TO CLAIMANTS TEODORO

) NGUEMA OBIANG MANGUE'S AND

) SWEETWATER MALIBU, LLC'S MOTION

) TO DISMISS VERIFIED COMPLAINT FOR

) FORFEITURE IN REM

)

) Hearing: April 8, 2014 (8:30 a.m.)

1 I, Woo S. Lee, declare and state as follows:

2 1. I am a trial attorney with the United States Department of Justice ("DOJ"),  
3 Criminal Division's Asset Forfeiture and Money Laundering Section, and am a member  
4 of the bars of the State of New York and the District of Columbia.

5 2. I have personal knowledge of the facts set forth in this Declaration and if  
6 necessary could competently testify thereto under oath.

7 3. Attached hereto as **Exhibit 1**, is a true and correct copy of an opinion and  
8 order entered in United States v. One White Crustal Covered Bad Tour Glove et al., CV  
9 11-3582 GW-SSx, on August 19, 2013.

10 4. Attached hereto as **Exhibit 2**, is a true and correct copy of an opinion and  
11 order entered in United States v. One White Crustal Covered Bad Tour Glove et al., CV  
12 11-3582 GW-SSx, on June 20, 2013.

13 5. Attached hereto as **Exhibit 3**, is a true and correct copy of an opinion and  
14 order entered in United States v. One White Crustal Covered Bad Tour Glove et al., CV  
15 11-3582 GW-SSx, on September 7, 2012.

16 6. Attached hereto as **Exhibit 4**, is a true and correct copy of an excerpt of  
17 Claimants' Reply In Support of Motion for Summary Judgment on the Limited Issue of  
18 Probable Cause; or In the Alternative, Order Finding the Government Lacked Probable  
19 Cause at the Time It Instituted the Action for Forfeiture In Rem in United States v. One  
20 White Crustal Covered Bad Tour Glove et al., CV 11-3582 GW-SSx, on June 7, 2013.

21 7. Attached hereto as **Exhibit 5**, is a true and correct copy of an excerpt of the  
22 Court Reporter's transcript of a hearing held in United States v. One White Crustal  
23 Covered Bad Tour Glove et al., CV 11-3582 GW-SSx, on September 6, 2012.

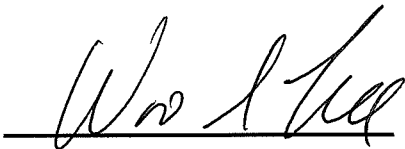
24 8. Attached hereto as **Exhibit 6**, is a true and correct copy of an excerpt of  
25 Claimants' Memorandum of Points and Authorities filed in support of their Motion for  
26 Summary Judgment on the Limited Issue of Probable Cause; or In the Alternative, Order  
27  
28

1 Finding the Government Lacked Probable Cause at the Time It Instituted the Action for  
2 Forfeiture In Rem in United States v. One White Crustal Covered Bad Tour Glove et al.,  
3 CV 11-3582 GW-SSx, on March 15, 2013.

4 9. Attached hereto as **Exhibit 7**, is a true and correct copy of an excerpt of the  
5 Court Reporter's transcript of a hearing held in United States v. One White Crustal  
6 Covered Bad Tour Glove et al., CV 11-3582 GW-SSx, on June 20, 2013.

7 I declare under penalty of perjury under the laws of the United States that the  
8 foregoing is true and correct.

9  
10 Executed on March 10, 2014 in Washington, D.C.

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14 Woo S. Lee  
15 Trial Attorney  
16 Criminal Division  
17 United States Department of Justice  
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